



25-8410-01D

Log # 1
IL- 0309-10

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-TUB

NOV 29 1982

Mr. James Reid
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

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DEC -1 1982

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

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ILL. E.P.A. — D.L.P.C.
STATE OF ILLINOIS

Re: ILD 001833714
Change of Ownership

Dear Mr. Reid:

In their letter of June 22, 1982, PVS Chemicals, Inc., notified U.S. Environmental Protection Agency (U.S. EPA) that they had purchased the Allied Chemical Corporation Calumet Works, Chicago, Illinois. Along with their letter PVS Chemicals, Inc., submitted a Notification of Hazardous Waste Activity in which the company identifies their hazardous waste activity solely as a generator of hazardous waste, and not a treatment and storage facility.

Subsequent investigation of our files and communication with PVS Chemical, Inc., revealed that:

- (1) The facility had interim status as a generator and a treatment and storage facility when it was owned by Allied Chemical Corporation.
- (2) The facility has not gone through closure as delineated in 40 CFR Part 265.
- (3) PVS Chemicals, Inc., has not submitted a revised Part A Permit Application as required in 40 CFR §122.23 for changes in interim status.
- (4) PVS Chemicals, Inc., is generating the identical wastes identified in the Allied Chemical Corporation Notification of Hazardous Waste Activity.

Enclosed are copies of our correspondence with PVS Chemicals, Inc.

EPA Region 5 Records Ctr.



288541

The above findings suggest that the site may still qualify as a treatment and storage facility. Therefore, U.S. EPA requests that Illinois Environmental Protection Agency (IEPA) inspect the facility to determine its compliance with the requirements under RCRA. We also request IEPA's recommendation as to what actions, if any, should be taken against both PVS Chemicals, Inc., and Allied Chemical Company.

Please respond to Mr. Gale Hruska of my staff, at (312) 886-6138, with the inspection results and your recommendations.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William H. Miner". The signature is fluid and cursive, with the first name "William" being the most prominent.

William H. Miner, Chief
Technical, Permits, and Compliance Section

Enclosures



PVS CHEMICALS, INC. (ILLINOIS)

SUBSIDIARY OF PRESSURE VESSEL SERVICE, INC.

12260 South Carondelet Avenue • Chicago, Illinois 60633

Phone 312-933-8800

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JUL 2 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

RECEIVED
7/06/82

June 22, 1982

Y. J. Kim
EPA REGION V
RCRA ACTIVITIES
P O BOX 7861
CHICAGO IL 60680

Gentlemen:

Attached is our completed EPA Form 8700-12(6-80) entitled
NOTIFICATION OF HAZARDOUS WASTE FACILITY.

We apologize for the delay in submitting this form. However,
we were under the impression at the time of our purchase of
the Allied Chemical Corporation plant at 12260 S. Carondelet
Ave., Chicago IL 60633, in October, 1981, that notification
of such sale in correspondence to RCRA at that time, also
automatically transferred the Federal ID number to PVS
Chemicals, Inc. (Illinois).

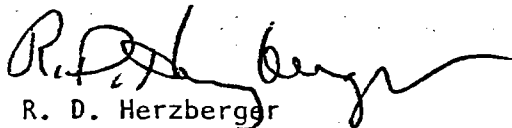
We wish now to establish our own Federal ID number, and when
that is accomplished, file an Amended Part A.

If there appear to be any complications or if additional
information is required, please contact us immediately.

Thank you for your assistance in our request.

Very truly yours,

PVS CHEMICALS, INC. (ILLINOIS)


R. D. Herzberger
Plant Manager

RDH:er

Encl.

cc: Mr. Broslin - EPA - Region V
A. Schlumberger - Detroit

ILD 001833 714

GEN TSD P.A.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 1 3	U 1 5 9	U 2 3 9			
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

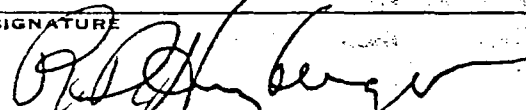
49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE (D001) ☒ 2. CORROSIVE (D002) ☒ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) R. D. HERZBERGER-PLANT MANAGER	DATE SIGNED 6-22-82
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RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: D. Hertzburger (933-8800)

FROM: J. Brossman (886-3785)

DATE 6-16-82
TIME 2:15 pm

SUBJECT

PVS Chemical- No ID No.-Formerly Allied Chemical -ID 00183714

SUMMARY OF COMMUNICATION

I contacted Mr. Hertzburger to determine why PVS failed to submit an amended part A when they acquired the Allied Chemical Plant located at 12260 Carondelet Ave. in Chicago. Currently, PVS is operating without an EPA I.D. No.

When Allied Chemical owned this facility they operated a surface impoundment to manage hazardous waste. Mr. Hertz indicated that the surface impoundment is not presently used to manage hazardous waste; therefore, PVS has not complied with the groundwater regulations. I informed Mr. Hertzburger that the RCRA regulations require PVS to monitor the groundwater until the surface impoundment is closed in accordance with the hazardous waste regulations.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Based upon my phone conversation with Mr. Hertzburger, it appears that there may be a number of past and current RCRA violations at this facility. I recommend that an ISS inspection be performed ASAP to determine if this facility is in compliance. I also suggest that Allied Chemical be contacted to determine what they did to comply with the groundwater monitoring regulations between Nov. 19, 1981, and the date ownership of this facility was transferred to PVS Chemical.

INFORMATION COPIES

TO: Bob Stone, Art Kawatachi, Horst Witschonke, Bill Miner



PVS CHEMICALS, INC. (ILLINOIS)

SUBSIDIARY OF PRESSURE VESSEL SERVICE, INC.
12260 South Carondelet Avenue • Chicago, Illinois 60633
Phone 312-933-8800

July 16, 1982

Mr. Karl J. Klepitsch, Jr., Chief
Waste Management Branch
U. S. Environmental Protection Agency
Region V
111 West Jackson Boulevard
Chicago IL 60604

Dear Mr. Klepitsch:

I have had considerable recent discussion with members of your staff regarding the RCRA status of this plant. I would like to take this opportunity to explain the background information regarding RCRA, and seek your advice regarding further action.

The Calumet plant was owned by EL000/833 714 G, TSD, PA Allied Chemical Corporation until October 13, 1981, when it was sold to PVS Chemicals, Inc. (Illinois). As required by RCRA, Allied submitted Form 3010, and later the RCRA application, Part A, on November 14, 1980. The primary RCRA facility at Calumet Works was a two-compartment surface impoundment. The surface impoundment was a hazardous facility pursuant to RCRA due to the pH of the water handled in the impoundments.

Prior to November, 1981, the plant performed process modifications which raised the pH of the material entering the impoundments to a level classified as non-hazardous pursuant to RCRA. The solid residue generated in the impoundments is non-hazardous pursuant to RCRA.

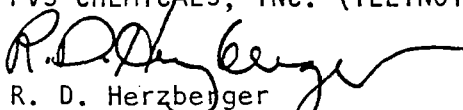
Based on the fact that the surface impoundments do not handle hazardous waste, it is my understanding that RCRA registration is unnecessary. I have filed documents apprising you of the transfer of ownership of Calumet Works from Allied to PVS, and have requested a RCRA ID number via a re-filed Form 3010 on June 22, 1982.

There still appears to be some misunderstanding regarding the exact RCRA status of this facility, and the forms and other paperwork which should be filed. Your guidance regarding how we should proceed in this matter would be greatly appreciated. Please call me at any time at 312-933-8800. I would be happy to meet with you at your office at your convenience if that would prove helpful.

Thank you.

Very truly yours,

PVS CHEMICALS, INC. (ILLINOIS)


R. D. Herzberger
Plant Manager

RDH:er

cc: A. Schlumberger - Detroit Office

RECEIVED

JUL 19 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

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7/19/82